DP Barcode: D160330
PC#: 101801
Date Out of EFGWB:

APR 9 1991

TO: Walter Francis
Product Manager # 32
Registration Division (H7505C)

FROM: Akiva Abramovitch, Ph.D., Chief
Review Section #3
OPP/EFED/EFGWB (H7507C)

THROUGH: Henry Jacoby, Chief
OPP/EFED/EFGWB (H7507C)

Henry Jacoby

Attached, please find the EFGWB review of:

Submission/Case#: S389006, 033813

Common Name :

Chemical Name : 2,2-dibromo-2-nitrilopropionamide

Product Type : Disinfectant

Product Name : Biobrom

Company Name : Bromine Compounds Ltd.(Ameribrom, Inc.)

Purpose : Review protocol for aquatic field dissipation study

Date Received: 3/28/91 **EFGWB #(s):** 91-0336

Date Completed: 4/4/91

Total Reviewing Time: 2 days

Deferrals to:

_____Ecological Effects Branch/EFED

_____Science Integration & Policy Staff/EFED

_____Non-Dietary Exposure Branch/HED

_____Dietary Exposure Branch/HED

_____Toxicology Branch I, II/HED

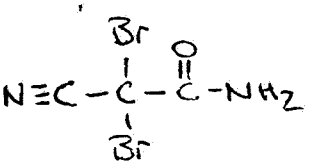
1. CHEMICAL:

Common Name:

Chemical Name: DBPNA, 2,2-dibromo-2-nitrilopropionamide

Type of product: Disinfectant

Chemical Structure:



Physical/Chemical Properties
molecular weight: 242
aqueous solubility:
vapor pressure:

2. TEST MATERIAL: See attached protocol.

3. STUDY/ACTION TYPE: Review proposed protocol for aquatic dissipation study.

4. PROTOCOL/DOCUMENT IDENTIFICATION:

(1) Aquatic Dissipation Study for the Direct Discharge of Biobrom C-103 A.I. (DBNPA) Treated Water into Outdoor Aquatic Sites Following EPA Subdivision N Guidelines. Study Director: Ronald C. Riever. Protocol No. 080790.

5. REVIEWED BY:

Kevin L. Poff, Chemist
Environmental Chemistry Review Section #3
Environmental Fate and Groundwater Branch/EFED

Date: 4/8/91

6. APPROVED BY:

Akiva Abramovitch, Ph.D., Chemist
Environmental Chemistry Review Section #3
Environmental Fate and Groundwater Branch/EFED

Date: APR 8 1991

7. CONCLUSIONS:

The EFGWB has no objections to the use of this protocol to conduct the aquatic dissipation study on Biobrom C-103. The protocol is too general to provide specific suggestions and criticisms.

8. RECOMMENDATIONS:

Inform the registrant that the EFGWB has no objections to the use of this protocol to conduct the aquatic field dissipation study.

9. BACKGROUND :

A. Introduction- Ameribrom Inc. is requesting the review of a protocol for the aquatic dissipation of Biobrom C-103 in treated water released from a cooling tower.

B. Direction for Use- Biobrom C-103 is applied to cooling towers intermittently at 2 to 4 day intervals, initially at 20-25 ppm then followed by a maintenance treatment of 3-5 ppm. Biobrom is registered as an active ingredient for an aquatic non-food, industrial use pesticide. See attached label.

10. DISCUSSION:
See conclusions.

11. COMPLETION OF ONE-LINER:
Not applicable.

12. CBI INDEX:
Not applicable.

DP BARCODE: D160330

CASE: 033813 DATA PACKAGE RECORD DATE: 01/16/91
SUBMISSION: S389006 BEAN SHEET Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 352 PROP TEST PROT-AMND
CHEMICAL:
ID#: 008622-00018 BIOBROM C-103 CONCENTRATE DBNPA
COMPANY: 008622 AMERIBROM INC.
PRODUCT MANAGER: 32 WALTER FRANCIS 703-557-3964 ROOM: CM#2 711E
PM TEAM REVIEWER: BARBARA PRINGLE 703-557-0484 ROOM: CM#2 711F
RECEIVED DATE: 01/04/91 DUE OUT DATE: 04/24/91

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 160330 EXPEDITE: N DATE SENT: 01/16/91 DATE RET.: / /
DP TYPE: 001 Submission Related Data Package
ADMIN DUE DATE: 03/27/91 CSF: N LABEL: N

ASSIGNED TO	DATE IN	DATE OUT
DIV : EFED	01/17/91	/ /
BRAN: EFGB	/ /	/ /
SECT:	/ /	/ /
REVR :	/ /	/ /
CONTR:	/ /	/ /

* * * DATA PACKAGE REVIEW INSTRUCTIONS * * *

Review proposed protocol for aquatic dissipation study

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL

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BIOBROM C-103L

DBNPA

A MICROBICCIDAL BACTERICIDE, FUNGICIDE, ALGACIDE AND SLIMICIDE, IN TREATING: RECIRCULATING AND ONCE-THROUGH COOLING WATER IN INDUSTRIAL COOLING WATER SYSTEMS PAPER MILLS, AIR-WASHER SYSTEMS, METALWORKING FLUIDS CONTAINING WATER, AND ENHANCED OIL RECOVERY SYSTEMS

ACTIVE INGREDIENT: 2,2-Dibromo-3-nitrilopropionamide	20%
INERT INGREDIENTS	80%
TOTAL	100%

10 LBS BIOBROM C-103L LIQUID per GALLON

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

If in eyes: Flush eyes immediately with plenty of water for at least 15 minutes and get medical attention at once.

If on skin: Wash with soap and plenty of water. Wash contaminated clothing before reuse.

If swallowed: Induce vomiting immediately by giving two glasses of water and sticking finger down throat. Repeat until vomit is clear. Call a physician. Never give anything by mouth to an unconscious person.

WASH THOROUGHLY AFTER HANDLING

See side panels for additional precautionary statements

EPA Reg. No. 8622-20

☐ **EPA Est. No. 15298-IS-1**
☐ **EPA Est. No. 36303-NJ-1**

Manufactured by

BROMINE COMPOUNDS LTD.
P.O. Box 180, Beer-Sheva 84101
ISRAEL

for

AMERIBROM INC.
1250 Broadway
New York, N.Y. 10001
UNITED STATES OF AMERICA

DIRECTIONS FOR TREATING INDUSTRIAL RECIRCULATING COOLING WATER IN INDUSTRIAL COOLING SYSTEMS

NOTE: Add BIOBROM C-103L separately to the system. Do not mix it with other additives, so as to avoid decomposition of BIOBROM C-103L due to the high pH of many additive formulations.

Add BIOBROM C-103L to the basin (or any other point of uniform mixing). Addition should be made via a metering pump; it may be continuous or intermittent, depending on the severity of the contamination when treatment is begun, and the in-system retention time. Optimum performance with this product is achieved by continuous or intermittent treatment. If "shock" treatment is used, the blowdown should be discontinued for 24-48 hrs.

FOR CONTROL OF BACTERIA

Add 0.00095-0.0095 gal of BIOBROM C-103L/1000 gal of water in the system, depending on the severity of contamination.

INTERMITTENT OR SLUG METHOD

Initial Dose: When the system is noticeably fouled, add 0.0048-0.0095 gal BIOBROM C-103L/1000 gal of water in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 0.0024-0.0095 gal BIOBROM C-103L/1000 gal of water in the system, every 4 days, or as needed to maintain control.

Badly fouled systems must be cleaned before treatment is begun.

CONTINUOUS FEED METHOD

Initial Dose: When the system is noticeably fouled, add 0.0048-0.0095 gal BIOBROM C-103L/1000 gal of water in the system.

Subsequent Dose: Maintain this level by pumping a continuous feed of 0.00095-0.0048 gal of BIOBROM C-103L/1000 gal of water in the system lost by blowdown.

Badly fouled systems must be cleaned before treatment is begun.

FOR CONTROL OF FUNGI AND ALGAE

Add 0.029-0.095 gal of BIOBROM C-103L/1000 gal of water in the system, depending on the severity of contamination.

INTERMITTENT OR SLUG METHOD

Initial Dose: When the system is noticeably fouled, add 0.048-0.095 gal of BIOBROM C-103L/1000 gal of water in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 0.029-0.095 gal of BIOBROM C-103L/1000 gal of water in the system daily or as needed to maintain control.

Badly fouled systems must be cleaned before treatment is begun.

CONTINUOUS FEED METHOD

Initial Dose: When the system is noticeably fouled, add 0.048-0.095 gal of BIOBROM C-103L/1000 gal of water in the system.

Subsequent Dose: Maintain this treatment level by pumping a continuous feed of 0.029-0.095 gal of BIOBROM C-103L/1000 gal of water in the system per day. Badly fouled systems must be cleaned before treatment is begun.

(Continue on column 4)

IN CASE OF EMERGENCY CONTACT:

OR

CHEMTREC (800) 424-9300

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JELLINEK, SCHWARTZ,
CONNOLLY & FRESHMAN, INC.

1015 15th Street, N.W., Suite 500
Washington, D.C. 20005

Telephone (202) 789-8181
Fax (202) 789-8243 / 789-8244
Telex 5106001897 Cable JSCF USA

January 4, 1991

Walter C. Francis, Acting PM32
Anti-Microbial Program Branch
Registration Division (H7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1921 Jefferson Davis Highway
Arlington, VA 22202

Re: Biobrom C-103 (DBNPA), EPA Registration No. 8622-18
Aquatic Field Dissipation Data Requirement
Request for a Meeting

Dear Mr. Francis:

As the authorized representative of AmeriBrom, Inc., I would like to request a meeting with the Agency to discuss environmental fate and effects data requirements for Biobrom C-103 (DBNPA). The data requirement in question is Guideline Number 164-2: Aquatic Field Dissipation (reference Pesticide Assessment Guidelines, Subdivision N: Environmental Fate).

Springborn Laboratories has been contracted to perform this study. Springborn would like to meet with Agency representatives to discuss study design so that study protocols can be developed and work can commence. The intended biocidal use of the product (i.e., industrial cooling towers for control of microbiological fouling) greatly complicates traditional experimental design considerations. Aquatic dissipation requirements typical to agricultural applications do not apply, and special conditions need to be recognized. Understanding the form of application, common industrial practices, and the behavior of the active ingredient, DBNPA, in water (e.g., rapid hydrolysis at circumneutral pH and greater) is also critical to study design.

I would ask that a member of the Environmental Fate and Groundwater Branch attend to discuss the scientific rationale. I would suggest Mr. Emil Regelman, as he is familiar with the cooling tower uses of the product and has had previous discussions with Mr. R.B. Foster, Laboratory Director at Springborn, on this subject. We propose that this meeting be set up on January 16, 1990. If this date is inconvenient, please contact Karen Warkentien so we can make other arrangements.

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AmeriBrom and the contract laboratory are committed to meeting the outstanding environmental data requirements for these products in a timely fashion. Agency guidance is requested to ensure that these data are adequate. For the reasons stated above, I believe that such a meeting would be in the best interests of all concerned.

I have enclosed a copy of Springborn's draft protocol for your information. This draft protocol details Springborn's proposed study design.

Should you have any additional questions regarding this request, please contact Karen Warkentien at (202) 789-3353.

Sincerely,

Diane Allemang

Diane S. Allemang
Jellinek, Schwartz, Connolly
& Freshman, Inc.
Authorized Representative of
AmeriBrom, Inc.

Enclosure

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DBNPA environmental fate review

Page _____ is not included in this copy.

Pages 8 through 15 are not included in this copy.

The material not included contains the following type of information:

___ Identity of product inert ingredients

___ Identity of product impurities

___ Description of the product manufacturing process

___ Description of product quality control procedures

___ Identity of the source of product ingredients

___ Sales or other commercial/financial information

___ A draft product label

___ The product confidential statement of formula

___ Information about a pending registration action

X FIFRA registration data

___ The document is a duplicate of page(s) _____

___ The document is not responsive to the request

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
